

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MEDIEN PATENT VERWALTUNG AG,

Plaintiff,

v.

WARNER BROS. ENTERTAINMENT
INC., TECHNICOLOR INC. and DELUXE
ENTERTAINMENT SERVICES GROUP
INC.,

Defendants.

Civil Action No. 1:10-cv-04119-CM

ECF Case

JURY TRIAL DEMANDED

**PLAINTIFF MEDIEN PATENT VERWALTUNG AG'S
NOTICE OF CROSS-MOTION FOR SUMMARY JUDGMENT OF INFRINGEMENT**

PLEASE TAKE NOTICE that upon the annexed: (1) Declaration of Gerhard Lehmann, dated September 7, 2012, and the exhibits attached thereto; (2) Declaration of Sean E. Jackson, Esq., dated September 7, 2012, and the exhibits attached thereto; (3) Local Rule 56.1 Statement of MPV; and (4) Memorandum of Law in Opposition to Deluxe's Motion for Summary Judgment of Non-Infringement and in Support of MPV's Cross-Motion for Summary Judgment of Infringement, and the Affidavit of Joseph Wary (Dkt. No. 92), Plaintiff Medien Patent Verwaltung AG ("MPV"), by and through its undersigned counsel, will move this Court pursuant to Rule 56 of the Federal Rules of Civil Procedure at the United States Courthouse, Southern District of New York, 500 Pearl Street, New York, NY 10007-1312, on such date and at such time as the Court may direct, for an order granting Plaintiff's instant cross-motion for summary judgment of infringement by defendant Deluxe Entertainment Services Group Inc.

(“Deluxe”) of U.S. Patent No. 7,187,633, denial of Deluxe’s motion for summary judgment of infringement (Dkt. No. 90), and for such other and further relief as this Court may deem just and proper.

Dated: September 7, 2012

Respectfully submitted,

By: s/ Sean E. Jackson

Andrew M. Riddles

Sean E. Jackson

CROWELL & MORING LLP

590 Madison Avenue

New York, NY 10022-2544

Ph: (212) 223-4000

Fax: (212) 223-4134

ariddles@crowell.com

sjackson@crowell.com

Jeffrey D. Sanok

Mark M. Supko

CROWELL & MORING LLP

1001 Pennsylvania Avenue, N.W.

Washington, D.C. 20004-2595

Tel: (202) 624-2500

Fax: (202) 628-5116

jsanok@crowell.com

msupko@crowell.com

*Attorneys for Plaintiff Medien Patent
Verwaltung AG*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 7, 2012, a true and correct copy of the foregoing PLAINTIFF MEDIEN PATENT VERWALTUNG AG'S NOTICE OF CROSS-MOTION FOR SUMMARY JUDGMENT OF INFRINGEMENT was served to all counsel of record via the Court's CM/ECF system and via electronic mail as follows:

Phoebe Anne Wilkinson, Esq.
CHADBOURNE & PARKE LLP
30 Rockefeller Plaza
New York, NY 10112
(212) 408-1157
Fax: (212) 541-5369
pwilkinson@chadbournel.com

Daniel M. Lechleiter, Esq.
Richard Trevor Carter, Esq.
FAEGRE BAKER DANIELS LLP
300 North Meridian Street, Suite 2700
Indianapolis, IN 46204
(317) 237-0300
Fax: (317) 237-1000
trevor.carter@faegrebd.com
daniel.lechleiter@faegrebd.com

Attorneys for Defendants Warner Bros. Entertainment, Inc. and Technicolor Inc.

Scott J. Bornstein, Esq.
Allan A. Kassenoff, Esq.
Julie P. Bookbinder, Esq.
GREENBERG TRAURIG, LLP
MetLife Building
200 Park Avenue, 34th Floor
New York, NY 10166
(212) 801-9200
Fax: (212) 801-6400
bornsteins@gtlaw.com
kassenoffa@gtlaw.com
bookbinderj@gtlaw.com

Attorneys for Defendant Deluxe Entertainment Services Group Inc.

s/ Sean E. Jackson

Sean E. Jackson